



"Rosenthal, Amy"
<amy.rosenthal@urs.com>
02/05/2012 12:07 PM

To ArcticAR <arcticar@urscorp.com>
cc
bcc
Subject FW: Re: Arctic EIS Assumptions and Activity Descriptions

From: Candace Nachman [mailto:Candace.Nachman@noaa.gov]
Sent: Tuesday, July 05, 2011 12:46 PM
To: Rosenthal Amy
Cc: Jolie.Harrison
Subject: Fwd: Re: Arctic EIS Assumptions and Activity Descriptions

Amy,

The email below lays out the comments from EPA on the assumptions and scenarios. Their biggest comments is to let us know that they are doing something similar for their current ODCE review and would be happy to share their results and information with us once they are done. They have a couple of specific comments at the end of the email to help with clarity in the document, but nothing earth-shattering. Again, I don't think any changes should be made to the document until we talk to BOEMRE.

Candace

----- Original Message -----

Subject: Re: Arctic EIS Assumptions and Activity Descriptions

Date: Wed, 29 Jun 2011 14:32:15 -0800

From: Curtis.Jennifer@epa.gov

To: Candace Nachman <Candace.Nachman@noaa.gov>

CC: Soderlund.Dianne@epamail.epa.gov, Mayers.Timothy@epamail.epa.gov,
Cool.Richard@epamail.epa.gov

Hello Candace,

Thank you for the opportunity to review the activity scenarios section.

Overall the discussion seems well laid out and in logical order. We believe the reasoning and justification for the numbers you cite seem sound. As you may know, we also are currently working to identify our activity/well numbers for our ODCEs based on the information that industry has provided to us through their Notices of Intent. Although we have not finalized our estimates, we anticipate evaluating estimated ranges which incorporate the higher numbers provided to us by the companies. We of course will be happy to share these estimates with you when they are final. Because we are using different documents and methodologies, it is likely that our ODCEs will contain numbers that are different from those in your document. We believe that as long as each

of us base our estimates on reasonable assumptions and the information provided to us, we are doing what we should. Also, as a general matter, based on a recent conversation with BOEMRE, it is our understanding that they may have information about the potential effects of the availability of ice management capacity that might affect the number of exploratory drilling programs that can be simultaneously implemented in any one drilling season by multiple companies. If BOEMRE does not raise or discuss this issue in their comments on this section, we recommend that you engage them in discussions on this issue to see if that information is relevant to your projections of the numbers of potential exploratory drilling programs.

We also have a few specific recommendations that hopefully will help improve readability and clarity.

First, we suggest when final estimates and numbers are identified, you may want to put those numbers in tables (perhaps number of leases/per lease by area and estimated number of wells per year by company and/or area). We also recommend that you identify the time frames/lengths of leases described in the third paragraph on page 1. Also, it may be helpful to list by lease number the cancelled leases referenced in the fourth paragraph on page 1.

In the second paragraph on page 2, it may be useful to clarify that the 2011 EP and four wells identified in the plan are anticipated for 2012.

In regard to your federal lease discussion in the Beaufort Sea on page 3, we understand the difficulties of making predictions regarding the potential number of drilling programs that might occur on federal leases on a yearly basis. The page 3 text (second full paragraph) implies there may be more than one drilling program implemented each year (at 2-3 drill sites per drilling program). Is there any factual basis upon which to make a reasonable projection of the potential number of drilling programs per year that might be implemented by one company or multiple companies? We recommend some effort to predict how many drilling programs could be potentially implemented on a yearly basis if at all possible.

In the third paragraph on page 4, we recommend clarifying if the 1 or 2 to 5 wells are the total number of wells, or number per year. We suggest that the language in the fourth paragraph on page 4 be revised to clarify whether the six Shell wells are the total number for the 5 years, with 3 or 4 wells in 2012 being part of that number, subsequent to 2012, or a totally different estimate from what Shell provided.

Finally, it is unclear how many wells are anticipated on a yearly basis for Shell, CPAI and Statoil in the Chukchi Sea discussion on page 5. This text draft appears to predict up to nine (9) wells per year for years 2014, 2015 and 2016 if all three companies are operating drilling programs simultaneously. Is that determination or conclusion intended in this draft text? Please consider some further clarification on this issue and consider supporting your determinations by a table, if included.

Again, thank you for the opportunity to review. If you have any questions regarding our comments, please let us know.

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To: "Loman, Jeffery" <Jeffery.Loman@boemre.gov>, "Skrupky, Kimberly A" <Kimberly.Skrupky@boemre.gov>, "Lewandowski, Jill" <Jill.Lewandowski@boemre.gov>, "Sloan, Pete" <Pete.Sloan@boemre.gov>, "Lage, Jana L" <Jana.Lage@boemre.gov>, "Banet, Susan" <Susan.Banet@boemre.gov>, "Walker, Jeffrey" <Jeffrey.Walker@boemre.gov>, "Monkelien, Kyle" <Kyle.Monkelien@boemre.gov>, Emma Pokon <Emma.Pokon@north-slope.org>, Robert Suydam <Robert.Suydam@north-slope.org>, Ben Greene <Ben.Greene@north-slope.org>, Tomlohman2@aol.com, Andy Mack <Andy.Mack@north-slope.org>, Bessie O'Rourke <Bessie.O'Rourke@north-slope.org>, Hanh Shaw/R10/USEPA/US@EPA, Jennifer Curtis/R10/USEPA/US@EPA, Dianne Soderlund/R10/USEPA/US@EPA, Mark Hodor <Mark.Hodor@noaa.gov>, "'jennifer.nist@noaa.gov'" <Jennifer.Nist@noaa.gov>, Steve Leathery <Steve.Leathery@noaa.gov>, Shane Guan <Shane.Guan@noaa.gov>
Cc: Michael Payne <Michael.Payne@noaa.gov>, "Jolie.Harrison" <Jolie.Harrison@noaa.gov>, amy.rosenthal@urscorp.com, jon.isaacs@urscorp.com, Joan.Kluwe@URSCorp.com, Kim.Fuchs@URSCorp.com, Sheyna Wisdom <sheynga.wisdom@fairweather.com>
Date: 06/23/2011 06:45 AM
Subject: Arctic EIS Assumptions and Activity Descriptions

All,

When you reviewed chapter 2 and spoke to us during our conference call about the chapter, everyone noted their great interest in knowing how the different surveys and programs that are noted for levels of activity in the alternatives would be defined and analyzed in the EIS.

Attached to this email is a short (7.5 page) description that will be used in Chapter 4 of the EIS to help with the impact analysis. It describes the 3 different types of activities (exploratory drilling, 2D/3D seismic surveys, and site clearance and shallow hazards). The document explains what a typical program for each of these in either offshore or state waters (for the Beaufort Sea) would entail. It also includes assumptions on the likely locations of these activities over the life of this EIS.

The most important thing is to make sure that the activities are described in a quantifiable way for the analysis. Therefore, it is very important to describe the number of vessels or equipment that would be used, the number of days, the number of sites or locations, etc.

Once we receive comments on this write-up for Chapter 4, we will create short 1-2 sentence summaries of each type of activity to include in Chapter 2 when we introduce the alternatives with reference this longer discussion in Chapter 4.

Having this piece is crucial to moving forward with Chapter 4. Therefore, if you all could please review and get me your comments by COB next Friday, July 1, I would greatly appreciate it. The document is not very long at all.

Also, as an update on when to expect Chapter 4. We are behind the schedule we had originally told you of when to expect it. You likely will see it in late July.

Thanks,
Candace

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Candace Nachman
Fishery Biologist

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Web: <http://www.nmfs.noaa.gov/pr/> [attachment "Arctic EIS Activity Scenario Assumptions For Agency Review (0623).doc" deleted by Jennifer Curtis/R10/USEPA/US]

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